

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

DAWAN BRENT)

Case No. 5:24-MJ- 482 (ML)

Defendant)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of September 30, 2023 in the county of Onondaga in the Northern District of New York the defendant violated:

Code Section

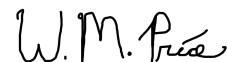
Title 21, United States Code, Section
841(a)(1) and (b)(1)(A)

Offense Description

Attempt to Possess with Intent to Distribute 500 Grams or More of
a Mixture or Substance Containing a Detectable Amount of
Methamphetamine

This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.



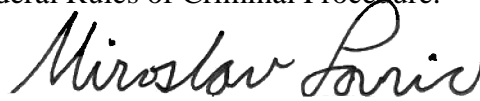
Complainant's signature

William M. Price, Postal Inspector

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: October 23, 2024



Judge's signature

City and State: Binghamton, New York

Hon. Miroslav Lovric, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, William M. Price, a Postal Inspector with the United States Postal Inspection Service, being duly sworn state:

1. I am a United States Postal Inspector currently assigned to Syracuse, New York, and have been so employed since July 2020. I am assigned to various types of investigations, including the use of the U.S. mail to transmit dangerous items. Prior to being employed by the U.S. Postal Inspection Service (“USPIS”), I was employed as a Special Agent with the United States Drug Enforcement Administration (“DEA”) from 2015 to 2020. During my time as a DEA Special Agent, I was responsible for the investigation of large-scale drug conspiracies, including many investigations with connections to transnational criminal organizations.

2. I submit this affidavit in support of a criminal complaint charging Dawan BRENT with attempted possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

3. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and my training and experience. As this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that BROOKS distributed and possessed with intent to distribute methamphetamine.

4. Beginning as early as Spring of 2022, DEA and USPIS personnel identified a vacant apartment on Center Street in Solway, New York (hereafter, “the Center Street Apt”), as a

location that received narcotics sent via the United States Postal Service. During the investigation, law enforcement learned that Dawan BRENT was receiving narcotics packages at the Center Street Apt.

5. On October 1, 2023, law enforcement identified and intercepted a United States Postal Service package sent from Lithonia, Georgia and destined for the Center Street Apt (hereinafter, “The Package”). The intended recipient’s last name listed on The Package was “BRENT.”

6. On October 5, 2023, The Package was searched pursuant to a federal search warrant and ultimately found to contain approximately 15,505 pills weighing approximately 4,305 grams. Subsequent laboratory analysis confirmed that the pills contained methamphetamine.

7. USPS business records for The Package indicated that someone utilizing telephone number (XXX) XXX-9039 had subscribed to delivery notifications from USPS regarding The Package. Through open-source inquiries and a law enforcement database search, law enforcement learned that (XXX) XXX-9039 was utilized by Dawan BRENT.

8. On October 10, 2023, I reviewed video surveillance of The Package being mailed from the Lithonia, GA Post Office on September 30, 2023, at approximately 11:34 a.m.. While reviewing the video, I observed The Package on the counter in front of a USPS clerk. I observed a person (hereafter, “Individual 1”) complete and pay for postage on The Package, and then exit the Post Office lobby.

9. In November 2023, I obtained a federal warrant to search an Apple account associated with BRENT, using (XXX) XXX-9039 and alias “Kobe Brent.” Upon executing that warrant, I observed the following:

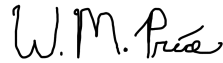
- a. On September 30, 2023, Individual 1¹ sent BRENT a photograph of the USPS receipt for shipment of The Package. BRENT and Individual 1 had a conversation regarding the anticipated delivery status of The Package.
- b. Images, captured at approximate locations near the Center Street Apt, of blue “M30” pills in a plastic bag, suspected embalming fluid, suspected fake legal mailings, suspected MDMA pills, an unknown female counting suspected blue “M30” pills on a table with currency present, and several other images related to narcotics.
- c. Images of BRENT.

10. Law enforcement also obtained a search warrant for data associated with Individual 1’s Apple account. A review of the data on that account revealed that BRENT and Individual 1 exchanged approximately 1,202 text messages from January 2023 to December 2023. These messages included conversations that, based on my training and experience, I believe relate to the use of the Center St Apt to receive drug parcels, and the production and sale of illegal controlled substances.

11. In light of the foregoing, I respectfully submit that there is that probable to believe that Dawan BRENT did attempt to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation Title 21, United States Code Section, 841(a)(1) and (b)(1)(A).

¹ This account was confirmed to be Individual 1’s based on the associated phone number, e-mail address, subscriber information, and selfie-style photographs therein.

Attested to by the affiant by telephone in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure.



William M. Price
United States Postal Inspector

I, the Honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on October 23, 2024, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Miroslav Lovric
United States Magistrate Judge